

11 May 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: In the matter of
WT Docket No. 10-119, RM-10762 and RM- 10844, and
3.5 GHz SAS and ESC Applications, GN Docket No. 15-319.

Dear Ms. Dortch,

This letter is submitted pursuant to Section 1.1206(b)(2) of the FCC's rules by Wireless Innovation Forum (WInnForum) to request administrative corrections to the Part 95 rules incorporated in the draft released April 27, 2017, of the proposed Report and Order in the above-captioned proceedings. The corrections requested are as follows:

New Section 95.903 (and throughout the Order) redefines the Citizen's Band Radio Service as the "CB Radio Service (CBRS)". The Commission indicates that, "This change will avoid confusion with the term 'citizens band radio service' used in the Communications Act of 1934, as amended, which encompasses all of the radio services in Part 95 that are licensed by rule except the Radio Control Radio Service." (Order at ¶ 58).

WInnForum reminds the Commission that there is already a designation for "CBRS", which is the Citizen's Broadband Radio Service as defined fully in 47 CFR Part 96 for the 3.5 GHz Band. We are extremely concerned that another designation for "CBRS" will certainly not avoid confusion and will indeed cause substantial confusion in the ecosystem for the 3.5 GHz CBRS. In addition, we are also concerned that we will now have to distinguish the 3.5 GHz CBRS from the CB Radio Service CBRS in order to avoid confusion in all of our documentation. This will impose a significant burden on the WInnForum and its members.

We ask that the Commission remove the CBRS designation for the Part 95 CB Radio Service. We believe the CB Radio Service is extremely well known worldwide by many other sobriquets including "CB", "CB Radio", "Citizen's Band Radio", etc, to name just a few (see for example, https://en.wikipedia.org/wiki/Citizens_band_radio). Referring to it as "CBRS" will cause unnecessary confusion for the 3.5 GHz CBRS community.

Please contact me if you should have any questions

Respectfully submitted,

By /s/:
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